

## REMARKS

In accordance with the foregoing, various of the claims have been amended to clarify the invention and to better distinguish same over the prior art.

No new matter is presented and, accordingly, approval and entry of the amended claims are respectfully requested.

## STATUS OF CLAIMS

Claims 1-24 are pending herein and each thereof is rejected, as detailed hereinafter.

The rejections are respectfully traversed.

### **ITEM 1: REJECTION OF CLAIMS 1, 2, 4, 8, 11 AND 14-24 UNDER 35 USC 102(b) AS BEING ANTICIPATED BY CEANTAR**

Claims 1, 2, 4, 8, 11, and 14-24 are amended hereinabove to clarify that a keyword is detected from a character string that is being input by a character input function, that is, during a character input operation (or process).

Ceantar merely proposes a method of specifying a dictionary type (contents), a search type and a keyword on the browser. The keyword to be searched is input by an operator. Whatever word that is input to the keyword field is detected as the keyword to be searched. In other words, all of the characters input to the keyword field are detected as the characters forming the keyword.

On the other hand, the present invention detects a keyword from a character string that is being input by a character input function (that is, during a character input operation or process). Since the keyword can be detected during the character input function, it is possible to carry out a desired operation related to the characters that are being input by the character input function, such as searching a dictionary, starting a program and starting a conversion program, directly using the detected keyword, when inputting the text of mail, for example. For this reason, the desired operation related to the characters that are being input by the character input function can be carried out without interrupting the character input function.

Ceantar fails to teach carrying out a desired operation related to the characters that are being input, directly using the keyword that is detected from the character string that is input by the character input function. This is because Ceantar fails to teach the detection of the keyword from the character string that is input by the character input function. In addition, there is no teaching in Ceantar of linking the keyword to the operation related to the characters that are being input.

For the foregoing reasons, it is submitted that claims 1, 2, 4, 8, 11, and 14-24 are allowable over Ceantar.

**ITEM 2-1: REJECTION OF CLAIMS 5 AND 9 FOR OBVIOUSNESS UNDER 35 USC 103(a) OVER CEANTAR IN VIEW OF BROWN ET AL.**

Claims 5 and 9 are dependent upon, and thus inherit the patentable distinctions of, the base claims 4 and 8 which clearly distinguish over Ceantar, as discussed above.

Brown et al. likewise fail to teach or suggest the subject matter of the base claims 4 and 8 and likewise of claims 5 and 9. Accordingly, it is submitted that claims 5 and 9 are allowable over Ceantar and Brown et al.

**ITEM 2-2: REJECTION OF CLAIMS 6 AND 12 FOR OBVIOUSNESS UNDER 35 USC 103(a) BASED ON CEANTAR IN VIEW OF BRANDT ET AL.**

Claims 6 and 12 are dependent upon, and thus inherit the patentable distinctions of, the base claims 4 and 11 which clearly distinguish over Ceantar, as discussed above.

Brandt et al. fails to teach or suggest the subject matter of the base claims 4 and 11 and likewise of claims 6 and 12. Accordingly, it is believed that claims 6 and 12 are allowable over Ceantar and Brandt et al.

**ITEM 2-3: REJECTION OF CLAIMS 3, 7, 10, AND 13 FOR OBVIOUSNESS UNDER 35 USC 103(a) OVER CEANTAR IN VIEW OF TRAN ET AL.**

Claims 3, 7, 10, and 13 are amended hereinabove, in line with the amendments to the base claims 1, 4, 8, and 11.

Claims 3, 7, 10, and 13 are dependent upon, and thus inherit the patentable distinctions of, the base claims 1, 4, 8, and 11 which are clearly delimited over Ceantar, as discussed above. Tran et al. fails to teach or suggest the subject matter of the base claims 1, 4, 8, and 11 and likewise of claims 3, 7, 10, and 13. Accordingly, it is submitted that claims 3, 7, 10, and 13 are allowable over Ceantar and Tran et al.

**LACK OF *PRIMA FACIE* DEMONSTRATION OF OBVIOUSNESS RENDERS REJECTIONS OF ITEMS 2-1 THROUGH 2-3 UNSUPPORTED**

Each of these obviousness rejections is supported by the unsubstantiated contention that "it would have been obvious to one of ordinary skill in the art at the time of the invention to modify Ceantar..." in accordance with some specific teaching of the respective, secondary references relied upon.

The Federal Circuit has rejected reliance on "basic knowledge" or "common sense" as affording "no evidentiary support", In re Zurko, 258 F3d 1379, 59 USPQ2d 1693 (Fed. Cir. 2001), and which has been rigorously endorsed by the PTO in accordance with the Memorandum of Stephen G. Kunin of February 21, 2002: "Procedures For Relying On Facts Which Are Not Of Record As Common Knowledge Or For Taking Official Action." (Hereinafter, "Kunin Memorandum", copy enclosed) The "lack of substantial evidence" is evident in the Action (see Kunin Memorandum, page 1) and MPEP 2144.03.

Clearly, the Examiner is merely advancing unsupported contentions based on presumably "common sense" and without evidentiary support to propose the combinations relied upon and the Kunin Memorandum unqualifiedly rejects same as inadequate.

**CONCLUSION**

In accordance with the foregoing, it is respectfully submitted that the pending claims patentably distinguish over the art of record, taken singly or in any proper combination and, there being no other objections or rejections, that the application is in condition for allowance, which action is earnestly solicited.

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If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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